

Motion to Suppress

While every opportunity and effort has been made to meet the motion deadline it has been very challenging to prepare for trial and familiarize myself with the 400+ pages of discovery. ~~I can now say that task is finished while~~ and to file motions for two separate cases both with deadlines within days of each other. With that said I did not get an opportunity to file this motion after reviewing the associated discovery and would like the opportunity to file this last motion as it is of great importance to case CR-27. During review of the discovery last night I discovered that all of the photos and photo copies ~~as well as~~ the incident report all have the same July 23, 2023 11:10 timestamp. Rather than timestamps on these items a template appears to have been used to insert the above mentioned data into. To have taken the dozens of photos and photo copies during a one minute period would simply not be possible.

A binding and true timestamp is generated by the device used to take the photo or copy and cannot be simply made manually ^{inserted} as a margin template. ~~for~~ Rather than to object to each photo or copy as it is displayed to the jury, the defendant asks that any photos, photo copies and incident reports fabricated by the use of a template or otherwise improper ~~method~~ ^{method} certified or verifiable method be suppressed from the ^{the} jury ~~evidence~~. These photos appear to be limited to the "attempted" discovery however may also ~~be~~ exist within the "escape" discovery.

GA 7/24/24

Photo

Subject: Crime Scene: 114 W Jackson Blvd
Taken: 07/23/2023 11:10

Lat./Long.: 36.2975800, -82.477434
Taken By Jessica Smith



Incident Report

Washington County Sheriff's Office

Report # 23-43599

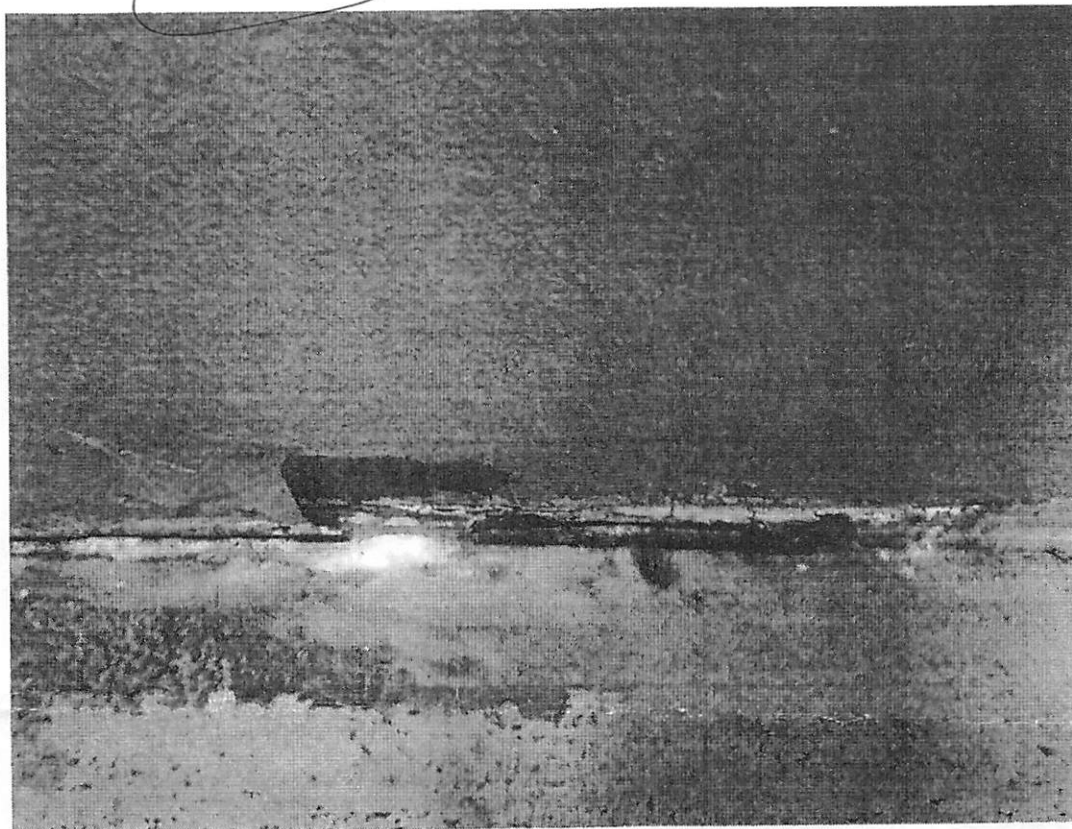
Photo

Subject: Crime Scene: 114 W Jackson Blvd

Taken: 07/23/2023 11:10

Lat./Long.: 36.2975800, -82.477434

Taken By Jessica Smith



Report # 23-43599

Lat./Long.: 36.2975897, -82.477433
Taken By Jessica Smith

[illegible]

occure

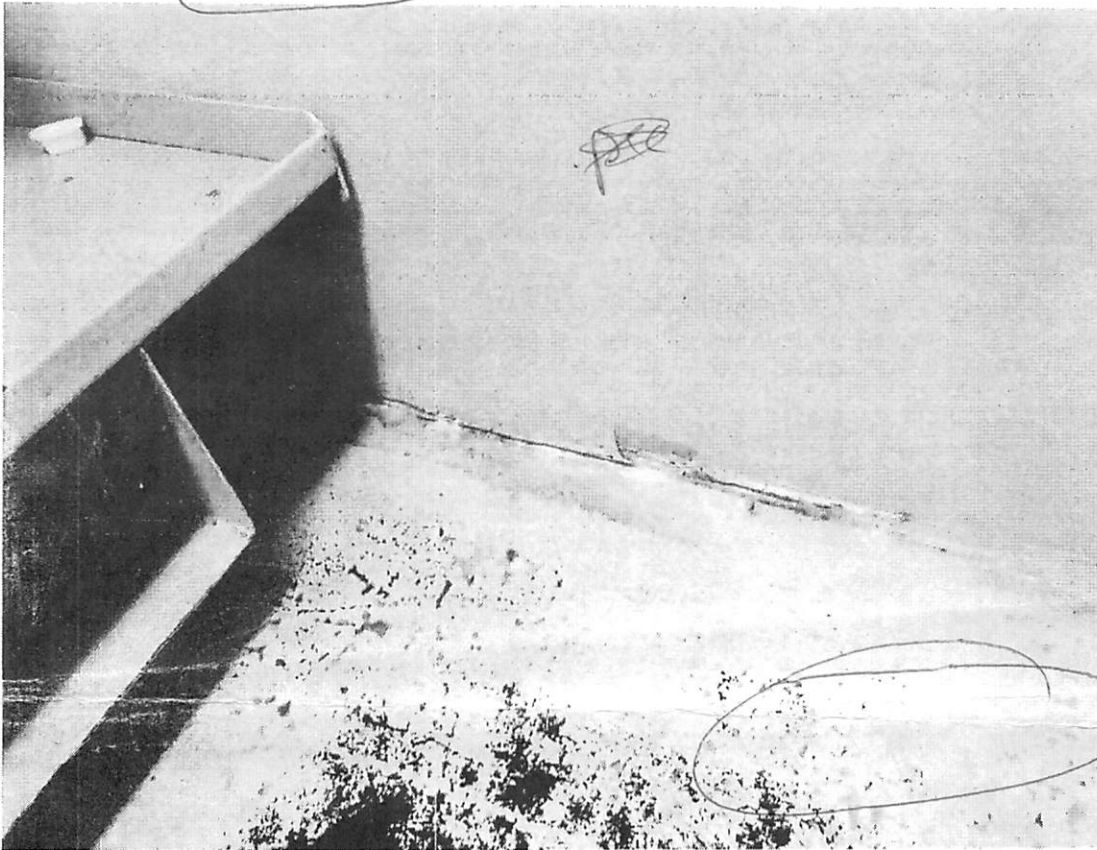
4:15

Job

Photo

Subject: Crime Scene: 114 W Jackson Blvd
Taken: 07/23/2023 11:10

Lat./Long.: 36.2975800, -82.477434
Taken By Jessica Smith



Challenge Time

Stamp

pics

"reported" - 11:10

"taken" - 11:10

all — pics & copies in one minute??

114 W Jackson Blvd, Washington County Jail, Jonesborough, TN

District: Zone 4
Occurred: 07/23/2023 04:15 07/23/2023 04:50
Reported: 07/23/2023 11:10
Approved:

Lat./Long.: 36.297504, -82.47754
Arrived: 07/23/2023 09:30

☒ Complainant wishes to prosecute

Approved By:

Memo Routing:

How Call Received: CAD Number: 23-43599

How Call Received: Officer Initiated

Use of Force: No

Is the number of suspects known?: Yes

Officer	Involvement	Employee #	Car #
Jessica Smith	Reporting	843	0

Offense

Description: 90Z Escape
Reported: 07/23/2023 11:10

Status: Attempted
Location of Offense: Jail/Prison
Gang Activity: None/Unknown
Type of Gang: Not Applicable/Unknown
Offender(s) Suspected of Using: Unknown/None of above
Drug Related: No

Complainant

Name: Deputy, WCSO
SSN:
Home Phone: 423-788-1414
Cell Phone:
Email:
Date of Birth: Unknown
Race: Unknown
Occupation:
Work Phone:
Reported: 07/23/2023 11:10

Alias:
Driver's License:
Address: 112 W Jackson Blvd
City/State/Zip: Jonesborough, TN 37659

Sex: Unknown
Language:
Employer:
Work Address:
City/State/Zip: